



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 22, 1990

Docket No. 50-397

Mr. G. C. Sorensen, Manager
Regulatory Programs
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Sorensen:

SUBJECT: ISSUANCE OF AMENDMENT NO.76 TO FACILITY OPERATING LICENSE
NO. NPF-21 - WPPSS NUCLEAR PROJECT NO. 2 (TAC NO. 75564)

The U.S. Nuclear Regulatory Commission has issued the enclosed amendment to Facility Operating License NPF-21 to the Washington Public Power Supply System for WPPSS Nuclear Project No. 2, located in Benton County near Richland, Washington. This amendment is in response to your letters dated January 3, 1990 (G02-90-003), January 4, 1990 (G02-90-004), and February 2, 1990 (G02-90-016).

This amendment revises Technical Specification 3/4.8.1, "A.C. Sources" by adding a footnote to surveillance requirement 4.8.1.1.2.d.2 providing an alternative method of performing the surveillance until May 30, 1990. Prior to the amendment request, the fuel oil for the emergency diesel generators was sampled and tested for particulates at 92 day intervals in accordance with ASTM D2274-70. The amendment requires that the oil be sampled and tested at 31 day intervals in accordance with ASTM 2276-78, Method A.

WNP-2 entered an action statement leading to plant shutdown on January 3, 1990 under the requirement of Technical Specification Section 3.0.3, and requested relief from the technical specification action statement. Relief was granted for 48 hours by the NRC Regional Administrator as indicated in his letter to you dated January 4, 1990. Upon receipt of your January 5 application for this license amendment, further relief was granted by our letter to you dated January 5, 1990. Because this amendment is needed to permit continued operation of the facility, this amendment is authorized on an emergency basis.

The amendment is effective through May 30, 1990. This time interval should allow you to complete your ongoing examination of your diesel fuel oil program and to propose technical specifications, as appropriate to ensure emergency diesel generator operability.

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A copy of the related Safety Evaluation supporting the amendment is enclosed. The notice of issuance and final determination of no significant hazards consideration and opportunity for hearing will be included with the Commission's biweekly Federal Register notices.

Sincerely,



Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 76 to Facility
Operating License No. NPF-21
2. Safety Evaluation

cc w/enclosures:
See next page

A copy of the related Safety Evaluation supporting the amendment is enclosed. The notice of issuance and final determination of no significant hazards consideration and opportunity for hearing will be included with the Commission's biweekly Federal Register notices.

Sincerely,

ORIGINAL SIGNED BY R. SAMWORTH

Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

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See next page

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Mr. G. C. Sorensen

WPPSS Nuclear Project No. 2
(WNP-2)

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

WPSS NUCLEAR PROJECT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 76
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission the NRC) has found that:
 - A. The application for amendment, filed by the Washington Public Power Supply System (the Supply System, also the licensee), by letters dated January 3, 1990 and January 4, 1990, and supplemented by letter dated February 2, 1990 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR CHAPTER I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment, and paragraph 2.c(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No.76, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into this license. APS shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Charles M. Trammell III, Acting Director
Project Directorate V
Division of Reactor Projects III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
Changes to the Technical
Specifications

Date of Issuance: February 22, 1990

ENCLOSURE TO LICENSE AMENDMENT 76
FACILITY OPERATING LICENSE NO. NPF-21
DOCKET NO. STN 50-397

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. Also to be replaced is the following overleaf page.

<u>Amendment Page</u>	<u>Overleaf Page</u>
3/4 8-4	3/4 8-3
3/4 8-5*	-
3/4 8-6*	-

* Text is shifted on pages 3/4 8-5 and 3/4 8-6. However, there is no change in the content of the text.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring, manually and automatically, unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each of the above required diesel generators shall be demonstrated OPERABLE:

- a. In accordance with the frequency specified in Table 4.8.1.1.2-1 on a STAGGERED TEST BASIS by:
 1. Verifying the fuel level in the day fuel tank.
 2. Verifying the fuel level in the fuel storage tank.
 3. Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day fuel tank.
 4. Verifying the diesel starts from ambient condition and accelerates to at least 900 rpm (60 Hz) in less than or equal to 10 seconds* for DG-1 and DG-2 and 13 seconds* for DG-3. The generator voltage and frequency shall be 4160 (+420, -250) volts and 60 ± 3.0 Hz within 10 seconds* for DG-1 and DG-2 and 4160 ± 420 volts within 13 seconds* for DG-3 after the start signal. The diesel generator shall be started for this test by using one of the following signals:
 - a) Manual.
 - b) Simulated loss-of-offsite power by itself.
 - c) Simulated loss-of-offsite power in conjunction with an ESF actuation test signal.
 - d) An ESF actuation test signal by itself.
 5. Verifying the diesel generator is synchronized, loaded to greater than or equal to 4400 kW for DG-1 and DG-2 and 2600 kW for DG-3 in less than or equal to 60 seconds*, and operates with these loads for at least 60 minutes.
 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
 7. Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 230 psig for DG-1 and DG-2 and 200 psig for DG-3.

*These diesel generator starts from ambient conditions shall be performed at least once per 184 days in these surveillance tests and all other engine starts for the purpose of this surveillance testing shall be preceded by an engine prelube period and/or other warmup procedures recommended by the manufacturer so that mechanical stress and wear on the diesel engine is minimized.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. At least once per 92 days by removing accumulated water the fuel storage tanks.
- d. At least once per 92 days and from new fuel oil prior to addition to the storage tanks, by obtaining a sample obtained in accordance with ASTM-D270-1975, and by verifying that the sample meets the following minimum requirements and is tested within the specified time limits:
 - 1. As soon as sample is taken or from new fuel prior to addition to the storage tank, as applicable, verify in accordance with the tests specified in ASTM-D975-77 that the sample has:
 - a) A water and sediment content of less than or equal to 0.05 volume percent.
 - b) A kinematic viscosity @ 40°C of greater than or equal to 1.9 centistokes, but less than or equal to 4.1 centistokes.
 - c) A specific gravity as specified by the manufacturer @ 60/60°F of greater than or equal to 0.8299 but less than or equal to 0.8762 or an API gravity @ 60°F of greater than or equal to 30 degrees.
 - 2. Within 1 week after obtaining the sample, verify an impurity level of less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM-D2274-70.*
 - 3. Within 2 weeks after obtaining the sample, verify that the other properties specified in Table 1 of ASTM-D975-77 and Regulatory Guide 1.137, Position 2.a, are met when tested in accordance with ASTM-D975-77.
- e. At least once per 18 months, during shutdown, by:
 - 1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 - 2. Verifying the diesel generator capability to reject a load of greater than or equal to 1377 kW for DG-1, greater than or equal to 1377 kW for DG-2, and greater than or equal to

*In lieu of this requirement until May 30, 1990, each of the above required diesel generators shall be demonstrated OPERABLE at least once every 31 days by obtaining a sample of fuel oil from the discharge line of the storage tank transfer pumps in accordance with ASTM D2276-78, and verifying that total particulate contamination is less than 10 mg/liter when checked in accordance with ASTM D2276-78, Method A.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 2380 kW for DG-3 while maintaining engine speed \leq 75% of the difference between nominal speed and the overspeed trip set-point or 15% above nominal, whichever is less.
3. Verifying the diesel generator capability to reject a load of 4400 kW for DG-1 and DG-2 and 2600 kW for DG-3 without tripping. The generator voltage shall not exceed 4784 volts during and following the load rejection.
 4. Simulating a loss-of-offsite power by itself, and:
 - a) For divisions 1 and 2:
 - 1) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
 - 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the autoconnected shutdown loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 3.0 Hz during this test.
 - b) For division 3:
 - 1) Verifying deenergization of the emergency bus.
 - 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency bus with the permanently connected loads within 13 seconds and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency bus shall be maintained at 4160 ± 420 volts and 60 ± 3.0 Hz during this test.
 5. Verifying that on an ECCS actuation test signal, without loss-of-offsite power, the diesel generator starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be 4160 (+420, -250) volts for DG-1 and DG-2, 4160 ± 420 volts for DG-3 and 60 ± 3.0 Hz within 10 seconds for DG-1 and DG-2 and 13 seconds for DG-3 after the auto-start signal; the steady-state generator voltage and frequency shall be maintained within 4160 ± 420 volts and the above frequency limit during this test.
 6. Simulating a loss-of-offsite power in conjunction with an ECCS actuation test signal, and:
 - a) For divisions 1 and 2:
 - 1) Verifying deenergization of the emergency busses and loads shedding from the emergency busses.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 3.0 Hz during this test.
- b) For division 3:
 - 1) Verifying deenergization of the emergency bus.
 - 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency bus with the permanently connected loads and the auto-connected emergency loads within 30 seconds and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady state voltage and frequency of the emergency bus shall be maintained at 4160 ± 420 volts and 60 ± 3.0 Hz during this test.
7. Verifying that all automatic diesel generator division 1, 2, and 3 trips are automatically bypassed upon an ECCS actuation signal except engine overspeed, generator differential current, incomplete starting sequence and emergency manual stop.
8. Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 4650 kW for DG-1 and DG-2 and 2850 kW for DG-3. During the remaining 22 hours of this test, the diesel generator shall be loaded to 4400 kW for DG-1 and DG-2 and 2600 kW for DG-3. The generator voltage and frequency shall be 4160 (+420, -250) volts for DG-1 and DG-2, 4160 ± 420 volts for DG-3 and 60 ± 3.0 Hz within 10 seconds for DG-1 and DG-2 and 13 seconds for DG-3 after the start signal; the steady-state generator voltage and frequency shall be maintained within 4160 ± 420 volts and the above frequency limit during this test.

Within 5 minutes after completing this 24-hour test, perform Surveillance Requirement 4.8.1.1.2.e.4.a)2) and b)2).*

*If Surveillance Requirements 4.8.1.1.2.e.4.a)2) and/or b)2) are not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 4400 kW for DG-1 or DG-2 or 2600 kW for DG-3 for 1 hour or until operating temperature has stabilized.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 76 TO FACILITY OPERATING LICENSE NO. NPF-21
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

1.0 INTRODUCTION

On January 2, 1990, WNP-2 failed to meet the Technical Specification (TS) surveillance requirement 4.8.1.1.2.d.2 to verify an impurity level of less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM D 2274-70. By letter dated January 3, 1990 the licensee requested a one time relief from TS surveillance requirement 4.8.1.1.2.d.2 in order to avoid unnecessary shutdown of the facility. Upon approval of this relief, the licensee would perform monthly sampling from the discharge of the running fuel oil transfer pump for testing in accordance with ASTM D 2276-78, Method A. ASTM D 2276-78, Method A determines particulate contamination in the diesel fuel oil. ASTM D 2274-70 measures the stability of distillate fuel oil under accelerated oxidizing conditions. On January 4, 1990, by exercising enforcement discretion Region V granted temporary relief from the surveillance requirement until 6 pm, January 5, 1990, to permit the licensee to prepare and submit an application for an emergency TS amendment. By letter dated January 4, 1990, the licensee requested an amendment to the WNP-2 TS on an emergency basis. This amendment requested replacement of impurity level surveillance by ASTM D 2274-70 with particulate contamination level surveillance by ASTM D 2276-78.

On January 5, 1990, NRC authorized a temporary waiver of compliance with TS surveillance requirement 4.8.1.1.2.d.2 for diesel fuel oil impurity testing in accordance with ASTM D 2274-70, to be effective until we have completed our review of the licensee's January 4, 1990 emergency TS amendment request. By letter dated February 2, 1990 the licensee revised the request to make the change effective through May 30, 1990.

2.0 EVALUATION

The diesel fuel oil system which supplies quality fuel to the diesel generators is one of the support systems for the diesel generators required to ensure their proper operation. The TS surveillance requirements ensure the quality, and additionally, the corrective actions in the event the fuel does not meet the specified quality criteria. The existing TS requires testing of the stored fuel oil impurity level in accordance with ASTM D 2274-70 every 92 days. The proposed emergency TS amendment requests replacement of the present impurity level surveillance done by ASTM D 2274-70 with particulate

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contamination level surveillance done by ASTM D 2276-78 every 31 days. ASTM D 2274-70, specified in existing TS surveillance requirements, involves the measurement of the stability of distillate fuel oil under accelerated oxidizing conditions and has an acceptance level of less than 2 mg of insolubles per 100 ml. This test method for the existing TS involves taking a fuel oil sample from the tank with a thief sampler, filtering the sample, heating the sample to 203°F, bubbling oxygen into the sample for 16 hours, and then filtering and weighing the particulates collected. This test provides a measure of the aging of fuel which results in particulate generation.

The replacement standard proposed in the requested emergency TS amendment, ASTM D 2276-78, Method A, involves a gravimetric determination of total particulate contaminant in the fuel and has an acceptance level of 10 mg per liter. The test method for the proposed TS involves taking a sample from a flowing pipe that is circulating the fuel oil from the storage tank to the day tank and then filtering and weighing the particulates collected. This proposed test provides gravimetric measurement of the particulates present in the existing stored fuel oil which must be minimized to avoid filter plugging and other particulate induced diesel operational problems.

It is the staff's position that the substitution of ASTM D 2274-70 for ASTM D 2276-78, Method A is acceptable on an interim basis. The use of ASTM D 2276-78, Method A on a permanent basis should be accompanied by further modifying of other surveillance requirements to provide immediate assurance for acceptance of quality fuel oil and maintenance of high quality stored fuel to ensure increased diesel generator availability. A fully effective fuel oil surveillance program, adopted by several licensees, improved TS program, and ANSI/ANS-59.51 "Fuel Oil Systems For Emergency Diesel Generators" would involve:

- different method for sampling and testing stored fuel oil,
- modifications to the procedure and criteria for accepting new fuel shipments for addition to stored fuel oil,
- addition of a requirement to drain water from fuel oil storage tanks on a regular basis,
- addition of alternate test methods for determining some fuel oil properties, and,
- deletion of certain tests on stored fuel oil.

We have evaluated the proposed emergency TS amendment and find it acceptable on an interim basis for a period of 120 days until a permanent TS change is submitted and approved. After 120 days the TS surveillance requirement 4.8.1.1.2.d.2 will revert back to the existing TS stability

testing in accordance with ASTM D 2274-70. We conclude that the proposed ASTM D 2276-78, Method A testing, which would be performed every 31 days compared to every 92 days in the existing TS ASTM D 2274-70, would provide adequate data to determine the fuel oil condition at the time of sampling as well as the tendency for formation of particulates under site storage conditions. During the interim period, we expect the licensee to do the following:

1. Determine the root cause of the sample results which failed to meet the TS surveillance requirement 4.8.1.1.2.d.2.
2. Submit a new TS amendment application to be effective when this interim emergency TS expires if required.
3. Provide plans for other treatments or additives to the storage tank to ensure that particulate generation in the storage tanks will be minimized, if applicable.

3.0 EMERGENCY CIRCUMSTANCES

The need for this change was identified on January 2, 1990 when the licensee was notified of results from analyses of quarterly samples taken on December 27, 1989. The results showed that the fuel oil impurity levels exceeded the value allowed by the surveillance requirement in the TS. Because the values reported to the licensee were substantially higher than previously experienced and because such a step change was not a usual expectation, the licensee requested confirmatory analysis from the laboratory. Results from the confirmatory analysis were received on January 3, and indeed confirmed that the fuel oil did not meet the TS.

At 4:45 p.m. PDT on January 3, the licensee declared the diesel generators inoperable and entered TS 3.0.3, leading to plant shutdown. The licensee requested relief from the surveillance requirement by letter on January 3 and January 4, 1990, applied for an amendment to the TS on an emergency basis to allow the unit to remain at power. At 6:45 p.m. PDT, January 3, the NRC staff granted the requested relief based on supplemental measurements which showed that at the present time fuel oil quality was sufficient to not impact operability of the generators. Based on the receipt of the license amendment application, additional relief was granted on January 5, for the period in which the amendment application was undergoing review.

We also find that the licensee could not reasonably have avoided this situation, that the licensee has responded in a timely manner, and has not delayed its application to take advantage of the Emergency License Amendment provisions of 10 CFR 50.91. Accordingly, the NRC staff concludes that the licensee has satisfied the requirements of 10 CFR 50.91(a)(5), and that a valid emergency exists.

This was confirmed by letters to the licensee dated January 4 and January 5, 1990.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in requirements with respect to the user installation of components located within the restricted area and changes in surveillance requirements. The staff has determined that this amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The staff has determined that the requested amendment does not involve a significant hazards consideration. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not:

1. Involve a significant increase in the probability or the consequences of any accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The amendment has been evaluated against these standards in 10 CFR 50.92. A discussion of these standards as they relate to the amendment request follows:

1. The change does not involve a significant increase in the probability or consequence of an accident previously evaluated because the diesel generators are transient and accident mitigating features and as such do not have the potential to increase the probability of an accident previously evaluated. The proposed change to ASTM D 2276-78 and the increased surveillance frequency will increase the reliability of the diesels and, as such, the mitigating feature of the diesels is enhanced.
2. The change does not create the possibility of a new or different kind of accident from any accident previously evaluated because testing to ASTM D 2276-78 is a superior method of determining fuel oil quality and as such the diesel reliability is not degraded and the possibility of new or different kinds of accidents is not presented.

3. The change does not create a significant reduction in margin of safety because the proposed change to ASTM D 2276 and the increased surveillance frequency will result in improved diesel reliability and as such there is no reduction in the margin of safety.

Accordingly, the Commission has determined that this amendment involves no significant hazards consideration.

6.0 CONTACT WITH STATE OFFICIAL

In accordance with 10 CFR 50.91, the licensee provided the State of Washington with a copy of its application. By letter dated January 17, 1990 the State of Washington advised that they do not have any comment on this amendment application.

7.0 CONCLUSION

In summary, based on the assertion that no significant hazard is created by the amendment and that the testing of the fuel oil in accordance with ASTM D2276-78 provides adequate assurance that the diesel generators are operable, the staff finds the proposed change to the method of testing is acceptable for a period of 120 days. In the interim, we expect the licensee to do the following:

1. Determine the root cause explaining the sample results which failed to meet the TS surveillance requirement 4.8.1.1.2.d.2,
2. Submit a new TS amendment application to be effective when this emergency TS expires after 120 days, and
3. Provide plans for other treatments or additives to the storage tanks to ensure that generation of particulates in the storage tanks will be minimized.

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Frank Witt

Dated: February 22, 1990